

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
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WLODZIMIERZ BELKOWSKI (AND HIS WIFE
TERESA BELKOWSKI),

07 CV 05339 (AKH)

Plaintiffs,

ANSWER TO
AMENDED COMPLAINT

-against-

100 CHURCH STREET, LLC,
150 BROADWAY CORP.,
150 BROADWAY NY ASSOC. LP.,
222 BROADWAY, LLC,
50 TRINITY LLC,
63 WALL STREET INC,
63 WALL INC,
88 GREENWICH LLC,
ALAN KASMAN DBA KASCO,
AMBIENT GROUP INC.,
ANN TAYLOR STORES CORPORATION,
AT&T WIRELESS SERVICES, INC.,
BAILEY NY ASSOCIATES,
BANKERS TRUST COMPANY,
BANKERS TRUST CORP,
BANKERS TRUST NEW YORK CORPORATION,
BATTERY PARK CITY AUTHORITY,
BLACK DIAMONDS LLC,
BLACKMON-MOORING-STEAMATIC CATASTROPHE,
INC. d/b/a BMS CAT,
BROADWAY WEST STREET ASSOCIATES LIMITED PARTNERSHIP,
BROOKFIELD FINANACIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, L.P.,
BROOKFIELD PARTNERS, L.P.,
BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS, INC.,
BROWN BROTHERS HARRIMAN & CO, INC,
BT PRIVATE CLIENTS CORP,
CHASE MANHATTAN BANK CORPORATION,
CUNNINGHAM DUCT CLEANING CO. INC.,
CUSHMAN & WAKEFIELD, INC.,
DEUTSCHE BANK TRUST COMPANY,

DEUTSCHE BANK TRUST CORPORATION,
ENVIROTECH CLEAN AIR, INC.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
HIGHLAND DEVELOPMENT LLC,
HILLMAN ENVIRONMENTAL GROUP, LLC
INDOOR AIR PROFESSIONALS INC.,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.
JONES LANG LASALLE AMERICAS INC,
JONES LANG LASALLE SERVICES INC,
KASCO RESTORATION SERVICES, CO.,
LAW ENGINEERING PC.,
MERRILL LYNCH & CO., INC.
MSDW 140 BROADWAY PROPERTY LLC,
NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL INC.,
ROYAL AND SUNALLIANCE INSURANCE GROUP PLC,
STEEPLECHASE ACQUISITIONS LLC,
STRUCTURE TONE GLOBAL SERVICES, INC.
STRUCTURE TONE, (UK), INC.,
SWISS BANK CORPORATION,
THE BANK OF NEW YORK TRUST COMPANY NA,
TISHMAN INTERIORS CORPORATION,
TOSCORP INC.,
TRC ENGINEERS, INC.,
TRINITY CENTRE LLC,
TULLY CONSTRUCTION CO INC.,
TULLY INDUSTRIES INC.,
WESTON SOLUTIONS, INC.,
WFP TOWER B CO. GP CORP.,
WFP TOWER B HOLDING CO., LP,
WFP TOWER B CO LP,
WFP TOWER D CO GP CORP,
WFP TOWER D HOLDING CO I LP,
WFP TOWER D HOLDING CO II LP,
WFP TOWER D HOLDING I GP CORP,
WFP TOWER D CO LP,
ZAR REALTY MANAGEMENT CORP.,

Defendants.

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**DEFENDANT ENVIROTECH CLEAN AIR INC.'S ANSWER
TO THE AMENDED COMPLAINT BY ADOPTION ("CHECK-OFF
COMPLAINT")**

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Amended Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
January 23, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY:


Heather L. Smar (4622)